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CISCO TECHNOLOGY, INC.

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
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13 CISCO SYSTEMS, INC. and CISCO  
14 TECHNOLOGY, INC.,

15 Plaintiffs,

16 v.  
17 SHENZHEN USOURCE TECHNOLOGY  
18 CO.; SHENZHEN WAREX  
TECHNOLOGIES CO., LTD.; and  
WAREX TECHNOLOGIES LIMITED,  
19 Defendants.

Case No.

**{PROPOSED} ORDER GRANTING  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL RELATED TO  
PLAINTIFFS' COMPLAINT AND  
EMERGENCY EX PARTE MOTION  
AS MODIFIED BY THE COURT**

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Case No.

**{PROPOSED} ORDER GRANTING PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE DOCUMENTS  
UNDER SEAL**

**{PROPOSED} ORDER**

This matter came before the Court on Plaintiffs' administrative motion to file documents under seal related to Plaintiffs' Complaint and Emergency *Ex Parte* Motion For Temporary Restraining Order filed pursuant to Civ. L.R. 7-11 and 79-5 (the "Administrative Motion"). Plaintiffs seek through their Administrative Motion an Order permitting them to file under seal unredacted versions of the following documents:

No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Plaintiffs' Complaint	Highlighted portions at 7:7-9 & 13-16; 11:11-26; and 12:11-13 & 17-23.	Contains confidential information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
	Plaintiffs' Emergency <i>Ex Parte</i> Motion and Memorandum in Support	Highlighted portions at 7:9-10 & 12-21; 8:6 & 24-28; 9:5-12, 14-15, 18, 21-24 & 28; and 10:1-3.	Contains confidential information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
	Plaintiffs' Decl. of First Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1; and 8:9.	Contains confidential personally identifiable information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.

1	Plaintiffs' Exhs. 1A – 1C to Decl. of First Witness	None.	N/A.
2	Plaintiffs' Decl. of Second Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1 & 11; 3:1-2, 21 – 26 & 28; 4:1-4, 6-7, 22-23 & 25-27; 5:9, 11, 13, 24 & 27; 10:2, 8- 20, 22, 25 & 27; 7:11- 16 & 22-27, and 8:12.	Contains confidential personally identifiable information and other information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
3	Plaintiffs' Declaration of Third Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1 & 22-28; 2:1-3, 5 & 21-23; 6:15-16, 19 & 21-28; 7:1-2 & 8; and 10:7-8 & 22.	Contains confidential personally identifiable information and other information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
4	Plaintiffs' Exhs. 3D – 3E to Decl. of Third Witness	None.	N/A.

Having considered Plaintiffs' Administrative Motion and Memorandum in support thereof, the Declaration of Gabriella A. Wilkins in support of that Administrative Motion, the Declarations of the First, Second and Third Witnesses in Support of Plaintiffs' Emergency *Ex Parte* Motion for Temporary Restraining Order, redacted and unredacted versions of the documents Plaintiffs propose to file under seal reflecting the precise portions of those documents to be redacted in the public record, and Plaintiffs' Proposed Order, this Court:

1 FINDS Plaintiffs have shown COMPELLING REASONS to support filing these  
2 documents under seal;

3 GRANTS Plaintiffs' Administrative Motion; and

4 HEREBY ORDERS that the unredacted documents shall be filed under seal, and the  
5 redacted versions of these documents shall be placed in the public record.

6 The Clerk shall file the redacted complaint in this matter and randomly assign the case.

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8 IT IS SO ORDERED.

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10 DATED: July 16, 2020



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United States District Court Judge  
The Honorable Beth Labson Freeman

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